EXHIBIT A

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11 Attorneys for Plaintiff
    SAP AKTIENGESELLSCHAFT

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13   UNITED STATES DISTRICT COURT

14   NORTHERN DISTRICT OF CALIFORNIA

15   OAKLAND DIVISION

16   SAP AKTIENGESELLSCHAFT, a   Case No. 4:07-cv-04187 SBA
     German corporation,
17   **PLAINTIFF SAP AG'S PRELIMINARY**
                  Plaintiff,   **INFRINGEMENT CONTENTIONS**
18
          v.   **[PATENT L.R. 3-1]**
19   i2 TECHNOLOGIES, INC., a Delaware
     corporation,   Judge: Hon. Saundra B. Armstrong
20   Defendant.

21

22   Pursuant to Patent L.R. 3-1 Plaintiff SAP Akteingesellschaft ("SAP") makes to Defendant

23   i2 Technologies, Inc. ("i2") this Disclosure of Asserted Claims and Preliminary Infringement

24   Contentions. SAP's disclosures to date are preliminary. SAP has requested documents from i2;

25   i2's productions have not yet been completed, either in response to these requests or pursuant to

26   Patent L.R. 3-4. Moreover, SAP only very recently obtained over 150 GB of documents and

27   information produced by i2 as part of discovery in *i2 Technologies US, Inc. et al. v. SAP AG et*

28   *al.*, Case No. 2:06-CV-352, Eastern District of Texas. SAP has not completed its substantive

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1   review of these documents. SAP anticipates that the review of these documents, further

2   discovery and other events in the litigation may cause it to further revise, supplement, and/or

3   otherwise modify its infringement contentions and it makes this disclosure without prejudice to

4   doing so.

5   A.   Patent L.R. 3–1(a)

6   SAP alleges that i2 infringes at least claims 1, 2, 3, 4, 5, 8, 10, 22, 25, 27, 30, 33 and 36 of

7   U.S. Patent No. 6,750,766 (the '766 patent) and at least claims 1, 8, 15 and 22 of U.S. Patent No.

8   6,407,761 (the '761 patent).

9   SAP anticipates that events in the litigation, such as substantive review of documents

10   produced by i2 to date, further discovery to be provided by i2 and/or by third parties and the

11   Court's claim construction may impact the patent claims it will allege i2 infringes. SAP reserves

12   the right to add to or otherwise modify its identification of claims it contends are infringed. SAP

13   additionally reserves the right to add to or otherwise modify its identification of the manner in

14   which claims are infringed.

15   B.   Patent L.R. 3–1(b)

16   SAP preliminarily identifies that the Accused Instrumentalities include i2 Six

17   Collaborative Supply Execution including Event Management and i2 Six Transportation and

18   Distribution Management, and any other i2 solution that monitors events or alerts in a manner

19   similar to i2 Six Collaborative Supply Execution including Event Management and/or provides

20   user graphical interface allowing configuration or customization of methods or operations of a

21   business object or element in a manner similar to i2 Six Transportation and Distribution

22   Management.

23   SAP anticipates that events in the litigation, such as substantive review of documents

24   produced by i2 to date, further discovery to be provided by i2 and/or by third parties and the

25   Court's claim construction may impact the patent claims it will allege i2 infringes and the

26   Accused Instrumentalities it will allege infringe those patent claims. SAP reserves the right to

27   add to or otherwise modify its identification of claims it alleges are infringed and identification of

28   Accused Instrumentalities it contends infringe those claims. SAP additionally reserves the right

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1   to add to or otherwise modify its identification of the manner in which claims are infringed.

2   **C.   Patent L.R. 3–1(c)**

3   Attached hereto as Exhibits A and B are charts preliminarily identifying where each

4   element of each asserted claim is found within the Accused Instrumentalities.

5   SAP's identification of Accused Instrumentalities above and/or in the accompanying chart

6   is Preliminary. SAP's identification of where elements of asserted claims may be found in the

7   Accused Instrumentalities also is preliminary. These identifications are based upon Plaintiff's

8   present knowledge and analysis. SAP continues its investigation and reserves its right to

9   supplement, amend, and/or revise its contentions as events in the litigation occur and SAP

10   conducts further investigation and/or analysis.

11   **D.   Patent L.R. 3–1(d)**

12   SAP presently contends each element of each asserted claim is literally present in the

13   Accused Instrumentalities. SAP reserves its right to assert infringement under the Doctrine of

14   Equivalents in light of further discovery, investigation or analysis, the Court's claim construction,

15   events in the litigation, or positions advanced by i2.

16   **E.   Patent L.R. 3–1(e)**

17   The claims of the '766 patent are entitled the priority date of February 6, 2002.

18   **F.   Patent L.R. 3–1(f)**

19   Certain versions of SAP's Task and Resource Management practice the claimed invention

20   in the asserted claims of the '766 patent. In addition, versions of SAP's ECC and SAP SCM

21   practice the claimed invention in the asserted claims of the '766 patent.

22   Certain versions of SAP Assistant and SAP's NetWeaver Developer Studio practice the

23   claimed invention in the asserted claims of the '761 patent.

24   SAP's contentions are made on information it has analyzed as of this date. Many

25   important pieces of discovery relevant to SAP's infringement contentions have not yet been made

26   or were made only so recently as to prevent meaningful analysis. SAP anticipates that

27   outstanding discovery and/or further analysis may impact its contentions and expressly reserves

28   the right to alter and supplement them. Further, in the event that new or different versions of the

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1   Accused Instrumentalities are made, SAP anticipates that it may supplement its contentions with

2   respect to such versions.

3   Nothing in this disclosure is intended to or does limit SAP's ability to present at trial, at

4   hearing on motion, or otherwise in support of or in opposition to a motion, or in other proceeding,

5   evidence, testimony, or argument in support of its contentions as to i2's infringement or for other

6   purposes. In particular, nothing limits the evidence SAP may introduce pursuant to Federal Rules

7   of Evidence 702, 703, or 705 or otherwise via witness providing expert testimony.

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9   Dated: January 11, 2007   FENWICK & WEST LLP

10   By:_____

11   Saina Shamilov

12   Attorneys for Plaintiff SAP Aktiengesellschaft

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EXHIBIT A

Plaintiff SAP AG's Preliminary Infringement Contentions

U.S Patent No. 6,407,761

Claim 1	i2 Six
A system for visually customizing methods of a business object by creating a configuration comprising:	i2 Six includes a system for visually customizing methods of a business object by creating a configuration. For example, i2 Six Transportation and Distribution Manager (TDM) includes a UI customization feature to visually customize methods of business objects, which are referred to as "operations" for a given "element" such as a truck load. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
means for providing a plurality of graphical icons representing a plurality of methods belonging to said business object;	i2 Six includes means for providing a plurality of graphical icons representing a plurality of methods belonging to said business object. For example, for a "truck load" element, TDM system presents a list with a plurality of operations, such as "ABPP_Reject," "ABPP_Tender_Accept," "Auto_Tender," "Cancel_Load," etc. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/TDM_FlashKitv7/BrowserPlayer.cfm
means for selecting one of said plurality of graphical icons representing one of said plurality of methods;	i2 Six includes means for selecting one of said plurality of graphical icons representing one of said plurality of methods. For example, in TDM system selection takes place with a pointing device used to click on graphical icons, such as boxes, buttons, and hyperlinks, for example, an operation in the list may be selected by clicking a checkbox or by selecting the "new" button. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
means for providing a plurality of	i2 Six includes means for providing a plurality of graphical icons representing a

graphical icons representing a plurality of parameters belonging to said one of said plurality of methods;	plurality of parameters belonging to said one of said plurality of methods. For example, parameters belonging to the selected methods are graphically represented as text by the TDM system, some parameters also including a pull-down list icon. For example, "Availability" parameter for a new operation (e.g., "ABPP_Tender_Reject") includes an associated pull-down list icon. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
means for selecting one of said plurality of graphical icons representing one of said plurality of parameters;	i2 Six includes means for selecting one of said plurality of graphical icons representing one of said plurality of parameters. For example, in the TDM system clicking on a pull-down list icon with a pointing device selects the parameter. For example, "Availability" parameter for a new operation (e.g., "ABPP_Tender_Reject") can be selected by clicking on the associated pull-down list icon. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
means for providing a plurality of graphical icons representing a plurality of fields belonging to said one of said plurality of parameters;	i2 Six includes means for providing a plurality of graphical icons representing a plurality of fields belonging to said one of said plurality of parameters. When a pull-down list is displayed, a plurality of icons representing the fields belonging to that parameter are provided by the TDM system. For example, the pull-down list of fields belonging to the Availability parameter includes textual icons for the fields "Both View and Update Modes," "Update Mode Only," and "View Mode Only." *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
means for selecting one of said plurality of graphical icons representing one of said plurality of fields;	i2 Six includes means for selecting one of said plurality of graphical icons representing one of said plurality of fields. Clicking on one of the icons representing the fields with a pointing device causes the field to be selected in the TDM system. For example, a user can click over the icon representing the "Both View and Update" field to select it. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
means for inputting a constant text value	i2 Six includes means for inputting a constant text value for said one of said

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for said one of said plurality of graphical icons representing one of said plurality of fields; and	plurality of graphical icons representing one of said plurality of fields. For example, after a user clicks on the selected field with a pointing device, the TDM system inputs the constant text value for the selected icon representing the field. *See, e.g.*, http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
means for saving said configuration based on said selecting of one of said plurality of graphical icons representing one of said plurality of methods belonging to said business object, said selecting of one of said plurality of graphical icons representing one of said plurality of parameters belonging to said one of said plurality of methods, and said selecting of one of said plurality of fields belonging to said one of said plurality of parameters.	i2 Six includes means for saving said configuration based on said selecting of one of said plurality of graphical icons representing one of said plurality of methods belonging to said business object, said selecting of one of said plurality of graphical icons representing one of said plurality of parameters belonging to said one of said plurality of methods, and said selecting of one of said plurality of fields belonging to said one of said plurality of parameters. For example, when the user clicks on the "Submit" button, the configuration for the operation is saved by the TDM system and becomes available for execution with respect to any listed "truck load." For instances, when a new operation is created (e.g., "ABPP_Tender_Reject"), a new button for the operation is displayed in the "Load Processing" UI as a fully working function. *See, e.g.*, http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
Claim 8	**i2 Six**
A method for visually customizing methods of a business object by creating a configuration comprising the steps of:	i2 Six designed to perform a method for visually customizing methods of a business object by creating a configuration. For example, TDM includes a UI customization feature to visually customize methods of business objects, which are referred to as "operations" for a given "element" such as a truck load. *See, e.g.*, http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
providing a plurality of graphical icons representing a plurality of methods belonging to said business object;	i2 Six provides a plurality of graphical icons representing a plurality of methods belonging to said business object. For example, for a "truck load" element, TDM presents a list with a plurality of operations, such as "ABPP_Reject," "ABPP_Tender_Accept," "Auto_Tender,"

	"Cancel_Load," etc. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/TDM_FlashKitv7/BrowserPlayer.cfm
selecting one of said plurality of graphical icons representing one of said plurality of methods;	i2 Six selects one of said plurality of graphical icons representing one of said plurality of methods. For example, in TDM selection takes place with a pointing device used to click on graphical icons, such as boxes, buttons, and hyperlinks, for example, an operation in the list may be selected by clicking a checkbox or by selecting the "new" button. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
providing a plurality of graphical icons representing a plurality of parameters belonging to said one of said plurality of methods;	i2 Six provides a plurality of graphical icons representing a plurality of parameters belonging to said one of said plurality of methods. For example, in TDM parameters belonging to the selected methods are graphically represented as text, some parameters also including a pull-down list icon. For example, "Availability" parameter for a new operation (e.g., "ABPP_Tender_Reject") includes an associated pull-down list icon. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
selecting one of said plurality of graphical icons representing one of said plurality of parameters;	i2 Six selects one of said plurality of graphical icons representing one of said plurality of parameters. For example, in TDM clicking on a pull-down list icon selects the parameter. For example, "Availability" parameter for a new operation (e.g., "ABPP_Tender_Reject") can be selected by clicking on the associated pull-down list icon. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
providing a plurality of graphical icons representing a plurality of fields representing a plurality of fields belonging to said one of said plurality of parameters;	i2 Six provides a plurality of graphical icons representing a plurality of fields belonging to said one of said plurality of parameters. For example, in TDM when a pull-down list is displayed, a plurality of icons representing the fields belonging to that parameter are provided. For example, the pull-down list of fields belonging to the Availability parameter includes textual

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Claim 15	i2 Six
	icons for the fields "Both View and Update Modes," "Update Mode Only," and "View Mode Only." See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
selecting one of said plurality of graphical icons representing one of said plurality of fields;	i2 Six selects one of said plurality of graphical icons representing one of said plurality of fields. For example, in TDM Clicking on one of the icons representing the fields causes the field to be selected. For example, a user can click over the icon representing the "Both View and Update" field to select it. See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
inputting a constant text value for said one of said plurality of graphical icons representing one of said plurality of fields; and	i2 Six inputs a constant text value for said one of said plurality of graphical icons representing one of said plurality of fields. For example, in TDM after a user clicks on the selected field, the computer inputs the constant text value for the selected icon representing the field. See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
saving said configuration based on said selecting of one of said plurality of graphical icons representing one of said plurality of methods belonging to said business object, said selecting of one of said plurality of graphical icons representing one of said plurality of parameters belonging to said one of said plurality of methods, and said selecting of one of said plurality of fields belonging to said one of said plurality of parameters.	i2 Six saves saving said configuration based on said selecting of one of said plurality of graphical icons representing one of said plurality of methods belonging to said business object, said selecting of one of said plurality of graphical icons representing one of said plurality of parameters belonging to said one of said plurality of methods, and said selecting of one of said plurality of fields belonging to said one of said plurality of parameters. For example, in TDM when the user clicks on the "Submit" button, the configuration for the operation is saved and becomes available for execution with respect to any listed "truck load." For example, when a new operation is created (e.g., "ABPP_Tender_Reject"), a new button for the operation is displayed in the "Load Processing" UI as a fully working function. See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm

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A computer-readable medium having stored thereupon a plurality of instructions, said plurality of instructions including instructions which, when executed by a processor, cause the processor to perform the steps of:	i2 Six includes a computer-readable medium having stored thereupon a plurality of instructions, said plurality of instructions including instructions which, when executed by a processor. For example, TDM can be stored on a computer-readable medium with instructions which when executed by a processor perform the following steps: *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
providing a plurality of graphical icons representing a plurality of methods belonging to said business object;	i2 Six provides a plurality of graphical icons representing a plurality of methods belonging to said business object. For example, for a "truck load" element, TDM presents a list with a plurality of operations, such as "ABPP_Reject," "ABPP_Tender_Accept," "Auto_Tender," "Cancel_Load," etc. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/TDM_FlashKitv7/BrowserPlayer.cfm
selecting one of said plurality of graphical icons representing one of said plurality of methods;	i2 Six selects one of said plurality of graphical icons representing one of said plurality of methods. For example, in TDM selection takes place with a pointing device used to click on graphical icons, such as boxes, buttons, and hyperlinks, for example, an operation in the list may be selected by clicking a checkbox or by selecting the "new" button. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
providing a plurality of graphical icons representing a plurality of parameters belonging to said one of said plurality of methods;	i2 Six provides a plurality of graphical icons representing a plurality of parameters belonging to said one of said plurality of methods. For example, in TDM parameters belonging to the selected methods are graphically represented as text, some parameters also including a pull-down list icon. For example, "Availability" parameter for a new operation (e.g., "ABPP_Tender_Reject") includes an associated pull-down list icon. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm

selecting one of said plurality of graphical icons representing one of said plurality of parameters;	i2 Six selects one of said plurality of graphical icons representing one of said plurality of parameters. For example, in TDM clicking on a pull-down list icon selects the parameter. For example, "Availability" parameter for a new operation (e.g., "ABPP_Tender_Reject") can be selected by clicking on the associated pull-down list icon. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
providing a plurality of graphical icons representing a plurality of fields belonging to said one of said plurality of parameters;	i2 Six provides a plurality of graphical icons representing a plurality of fields belonging to said one of said plurality of parameters. For example, in TDM when a pull-down list is displayed, a plurality of icons representing the fields belonging to that parameter are provided. For example, the pull-down list of fields belonging to the Availability parameter includes textual icons for the fields "Both View and Update Modes," "Update Mode Only," and "View Mode Only." *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
selecting one of said plurality of graphical icons representing one of said plurality of fields;	i2 Six selectes one of said plurality of graphical icons representing one of said plurality of fields. For example, in TDM clicking on one of the icons representing the fields causes the field to be selected. For example, a user can click over the icon representing the "Both View and Update" field to select it. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
inputting a constant text value for said one of said plurality of graphical icons representing one of said plurality of fields; and	i2 Six inputs a constant text value for said one of said plurality of graphical icons representing one of said plurality of fields. For example, in TDM after a user clicks on the selected field, the computer inputs the constant text value for the selected icon representing the field. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm

Claim 22	i2 Six
saving a configuration based on said selecting of one of said plurality of graphical icons representing one of said plurality of methods belonging to said business object, said selecting of one of said business object, said selecting of one of said plurality of graphical icons representing one of said plurality of parameters belonging to said one of said plurality of methods, and said selecting of one of said plurality of fields belonging to said one of said plurality of parameters.	i2 Six saves a configuration based on said selecting of one of said plurality of graphical icons representing one of said plurality of methods belonging to said business object, said selecting of one of said plurality of graphical icons representing one of said plurality of parameters belonging to said one of said plurality of methods, and said selecting of one of said plurality of fields belonging to said one of said plurality of parameters. For example, in TDM when the user clicks on the "Submit" button, the configuration for the operation is saved and becomes available for execution with respect to any listed "truck load." For example, when a new operation is created (e.g., "ABPP_Tender_Reject"), a new button for the operation is displayed in the "Load Processing" UI as a fully working function. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
Claim 22	**i2 Six**
A system for visually customizing methods of a business object by creating a configuration comprising:	i2 Six is a system for visually customizing methods of a business object by creating a configuration. For example, TDM includes a UI customization feature to visually customize methods of business objects, which are referred to as "operations" for a given "element" such as a truck load. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
a user interface for providing a plurality of graphical icons representing a plurality of methods belonging to said business object;	i2 Six includes a user interface for providing a plurality of graphical icons representing a plurality of methods belonging to said business object. For example, for a "truck load" element, TDM presents a list with a plurality of operations, such as "ABPP_Reject," "ABPP_Tender_Accept," "Auto_Tender," "Cancel_Load," etc. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/TDM_FlashKitv7/BrowserPlayer.cfm
a user interface for selecting one of said plurality of graphical icons representing	i2 Six includes a user interface for selecting one of said plurality of graphical icons representing one of said plurality of methods.

one of said plurality of methods;	For example, in TDM selection takes place with a pointing device used to click on graphical icons, such as boxes, buttons, and hyperlinks, for example, an operation in the list may be selected by clicking a checkbox or by selecting the "new" button. See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
a user interface for providing a plurality of graphical icons representing a plurality of parameters belonging to said one of said plurality of methods;	i2 Six includes a user interface for providing a plurality of graphical icons representing a plurality of parameters belonging to said one of said plurality of methods. For example, in TDM parameters belonging to the selected methods are graphically represented as text, some parameters also including a pull-down list icon. For example, "Availability" parameter for a new operation (e.g., "ABPP_Tender_Reject") includes an associated pull-down list icon. See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
a user interface for selecting one of said plurality of graphical icons representing one of said plurality of parameters;	i2 Six includes a user interface for selecting one of said plurality of graphical icons representing one of said plurality of parameters. For example, in TDM clicking on a pull-down list icon selects the parameter. For example, "Availability" parameter for a new operation (e.g., "ABPP_Tender_Reject") can be selected by clicking on the associated pull-down list icon. See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
a user interface for providing a plurality of graphical icons representing a plurality of fields belonging to said one of said plurality of parameters;	i2 Six includes a user interface for providing a plurality of graphical icons representing a plurality of fields belonging to said one of said plurality of parameters. For example, in TDM when a pull-down list is displayed, a plurality of icons representing the fields belonging to that parameter are provided. For example, the pull-down list of fields belonging to the Availability parameter includes textual icons for the fields "Both View and Update Modes," "Update Mode Only," and "View Mode Only." See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm

a user interface for selecting one of said plurality of graphical icons representing one of said plurality of fields;	i2 Six includes a user interface for selecting one of said plurality of graphical icons representing one of said plurality of fields. For example, in TDM clicking on one of the icons representing the fields causes the field to be selected. For example, a user can click over the icon representing the "Both View and Update" field to select it. See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
a user interface for inputting a constant text value for said one of said plurality of graphical icons representing one of said plurality of fields; and	i2 Six includes a user interface for inputting a constant text value for said one of said plurality of fields. For example, in TDM after a user clicks on the selected field, the computer inputs the constant text value for the selected icon representing the field. See, e.g.,http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
a subsystem for saving said configuration based on said selecting of one of said plurality of graphical icons representing one of said plurality of methods belonging to said business object, said selecting of one of said plurality of graphical icons representing one of said plurality of parameters belonging to said one of said plurality of methods, and said selecting of one of said plurality of fields belonging to said one of said plurality of parameters.	i2 Six includes a subsystem for saving said configuration based on said selecting of one of said plurality of graphical icons representing one of said plurality of methods belonging to said business object, said selecting of one of said plurality of graphical icons representing one of said plurality of parameters belonging to said one of said plurality of methods, and said selecting of one of said plurality of fields belonging to said one of said plurality of parameters. For example, in TDM when the user clicks on the "Submit" button, the configuration for the operation is saved and becomes available for execution with respect to any listed "truck load." For example, when a new operation is created (e.g., "ABPP_Tender_Reject"), a new button for the operation is displayed in the "Load Processing" UI as a fully working function. See, e.g.,http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm

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EXHIBIT B

Plaintiff SAP AG's Preliminary Infringement Contentions

U.S Patent No. 6,750,766

Claim 1	i2 Six
A method for monitoring specific areas of concern in warehouse operations comprising:	i2 Six is designed to perform a method for monitoring specific areas of concern in warehouse operations. For example, event Management in the i2 Collaborative Supply Execution module includes a method for monitoring specific areas of concern in warehouse operations. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
storing information describing operations of a warehouse in a database;	i2 Six stores information describing operations of a warehouse in a database. For example, i2 software is XML based and operates with different IT platforms (i.e., databases). Warehouse operations are described in data stored in a database, including data about inventory, supplier responses, etc. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
displaying information on a user interface about an alert type and a category of alert types associated with that alert type, wherein a category of alert types is one of several classes of alert types;	i2 Six displays information on a user interface about an alert type and a category of alert types associated with that alert type, wherein a category of alert types is one of several classes of alert types. For example, i2 Six UI for Event Management (in Collaborative Supply Execution module) displays information about alert types (event types) and categories of alert types including forecast, planning, and execution categories. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
receiving a user request for information about an alert type stored in the database;	i2 Six receives a user request for information about an alert type stored in the database. For example, Event Management users can click on a given alert type and drill

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	down to seek additional information. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
retrieving the requested information from the database, in response to the request; and	i2 Six retrieves the requested information from the database, in response to the request. For example, in Event Management the information about alerts is stored in a database, therefore there must be a mechanism to retrieve the information (e.g., SQL statements). *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
updating the user interface to display the requested information.	i2 Six updates the user interface to display the requested information. For example, the Event Management UI is updated to display the requested information. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
Claim 2	**i2 Six**
The method of claim 1 wherein the category of alert types includes one of: a category based on time dependency, a category based on warehouse geography, a category based on warehouse resources, and a category based on business objects.	In i2 Six the category of alerts types includes one of: a category based on time dependency, a category based on warehouse geography, and a category based on business objects. For example, Event Management in the i2 Collaborative Supply Execution module includes categories based on at least time dependency (such as "forecast analysis") and warehouse resources (such as "execution"). *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
Claim 3	**i2 Six**
The method of claim 2 wherein updating the user interface to display the requested information includes at least one of viewing alert types, displaying details for an alert type, displaying an application	In i2 Six updating the user interface to display the requested information includes at least one of viewing alert types, displaying details for an alert type, displaying an application log, and displaying a priority model for a task. For example, Event Management in the i2 Collaborative Supply Execution module

log, and displaying a priority model for a task.	updates the UI by displaying information about the alert type *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
Claim 4	**i2 Six**
The method of claim 2 wherein the user request is initiated by selecting a category of alert types to reveal the alert types in that category.	In i2 Six the user request is initiated by selecting a category of alert types to reveal the alert types in that category. For example, a user request in the i2 Event Management system can be initiated by clicking on a category tab, such as the "execution" tab, to reveal alert types in that category, such as a "max. inventory violation" alert type. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
Claim 5	**i2 Six**
The method of claim 2 wherein the user request is initiated by selecting an alert type to reveal details about the alert type.	In i2 Six the user request is initiated by selecting an alert type to reveal details about the alert type. For example, in Event Management a user request in the i2 system can be initiated by clicking on an alert type. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
Claim 8	**i2 Six**
The method of claim 1 further comprising: configuring an upper control level for an alert type, wherein an alert type comprises one of an unconfirmed task whose due date is approaching, a working area workload, a resource workload, the ratio of the number of tasks per suitably qualified resource, and	i2 Six configures an upper control level for an alert type, wherein an alert type comprises one of an unconfirmed task whose due date is approaching, a working area workload, a resource workload, the ratio of the number of tasks per suitably qualified resource, and a non-executable task. For example, the i2 Event Management includes the configuration of a lower control level for an alert type, such as a minimum buffer for a "Max. Inventory Violation"

a non-executable task; and	alert type, wherein the alert type comprises an unconfirmed task whose due date is approaching, such as the lack of a "supplier response" for supply of a forecasted amount of inventory approaching a "first impact date." *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
providing an alert on the user interface when a value of an object for which an alert has been configured has been exceeded.	i2 Six provides an alert on the user interface when a value of an object for which an alert has been configured has been exceeded. For example, the i2 Event Management provides an alert in the UI, such as a red icon, when the mismatch value for the inventory forecast and the supplier response exceeds the maximum buffer value. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
Claim 10	**i2 Six**
The method of claim 1 further comprising:	
configuring a lower control level for an alert type, wherein an alert type comprises one of an unconfirmed task whose due date is approaching, a working area workload, a resource workload, the ratio of the number of tasks per suitably qualified resource, and	i2 Six configures a lower control level for an alert type, wherein an alert type comprises one of an unconfirmed task whose due date is approaching, a working area workload, a resource workload, the ratio of the number of tasks per suitably qualified resource. For example, the i2 Event Management includes the configuration of a lower control level for an alert type, such as a minimum buffer for a "Min. Inventory Violation" alert type, wherein the alert type comprises an unconfirmed task whose due date is approaching, such as the lack of a "supplier response" for supply of a forecasted amount of inventory approaching a "first impact date." *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
providing an alert on the user interface when a value of an object for which an alert has been configured falls below the lower control level.	i2 Six provides an alert on the user interface when a value of an object for which an alert has been configured falls below the lower control level. For example, the i2 Event Management provides an alert in the UI, such as a red icon, when the mismatch value for the inventory forecast and the supplier response

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Claim 22	i2 Six
	falls below the minimum buffer value. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
A system for monitoring specific areas of concern in warehouse operations comprising: a device for monitoring specific areas of concern in warehouse operations comprising;	i2 Six is a system for monitoring specific areas of concern in warehouse operations comprising: a device for monitoring specific areas of concern in warehouse operations. For example, Event Management in the i2 Collaborative Supply Execution module monitors specific areas of concern in warehouse operations and runs on a computer system. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
a processor;	i2 Six includes a processor. For example, a computer system running Event Management includes a processor. *See, e.g.,*http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
a storage means for storing a database;	i2 Six includes a storage means for storing a database. For example, Event Management accesses information about alerts types, which are stored in a database. *See, e.g.,*http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
and a memory coupled to the processor to store instructions that, when applied to the processor, cause the processor to:	i2 Six includes a memory coupled to the processor to store instructions. For example, a computer system running Event Management includes a memory with instructions. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
store information describing operations of a warehouse in a database;	In i2 Six when instructions are applies to the processor, the instructions cause the processor to store information describing operations of a warehouse in a database. For example, i2 software is XML based and operates with different IT platforms (i.e., databases). Warehouse operations are described in data stored in a database,

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	including data about inventory, supplier responses, etc. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
display information on a user interface about an alert type and a category of alert types associated with that alert type, wherein a category of alert types is one of several classes of alert types;	In i2 Six when instructions are applies to the processor, the instructions cause the processor to display information on a user interface about an alert type and a category of alert types associated with that alert type, wherein a category of alert types is one of several classes of alert types. For example, i2 Six UI for Event Management (in Collaborative Supply Execution module) displays information about alert types (event types) and categories of alert types including forecast, planning, and execution categories. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
receive a user request for information about an alert type stored in the database;	In i2 Six when instructions are applies to the processor, the instructions cause the processor to receive a user request for information about an alert type stored in the database. For example, Event Management users can click on a given alert type and drill down to seek additional information. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
retrieve the requested information from the database, in response to the request; and	In i2 Six when instructions are applies to the processor, the instructions cause the processor to retrieve the requested information from the database, in response to the request. For example, in Event Management the information about alerts is stored in a database, therefore there must be a mechanism to retrieve the information (e.g., SQL statements). *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
update the user interface to display the requested information.	In i2 Six when instructions are applies to the processor, the instructions cause the processor to update the user interface to display the requested information. For example, the Event Management UI is updated to display the requested information.

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Claim 25	i2 Six
The system of claim 22 wherein the memory further includes instructions to cause the processor to cause the processor to:	See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
configure an upper control level for an alert type, wherein an alert type comprises one of an unconfirmed task whose due date is approaching, a working area workload, a resource workload, the ratio of the number of tasks per suitably qualified resource, and a non-executable task; and	In i2 Six the memory further includes instructions to cause the processor to configure an upper control level for an alert type, wherein an alert type comprises one of an unconfirmed task whose due date is approaching, a working area workload, a resource workload, the ratio of the number of tasks per suitably qualified resource, and a non-executable task.

For example, the i2 Event Management includes the configuration of a lower control level for an alert type, such as a minimum buffer for a "Max. Inventory Violation" alert type, wherein the alert type comprises an unconfirmed task whose due date is approaching, such as the lack of a "supplier response" for supply of a forecasted amount of inventory approaching a "first impact date."

See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm |
| provide an alert on the user interface when a value of an object for which an alert has been configured has been exceeded. | In i2 Six the memory further includes instructions to cause the processor to provide an alert on the user interface when a value of an object for which an alert has been configured has been exceeded.

For example, the i2 Event Management provides an alert in the UI, such as a red icon, when the mismatch value for the inventory forecast and the supplier response exceeds the maximum buffer value.

See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm |
| Claim 27 | i2 Six |

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The system of claim 22 wherein the memory further includes instructions to cause the processor to cause the processor to:	
configure a lower control level for an alert type, wherein an alert type comprises one of an unconfirmed task whose due date is approaching, a working area workload, a resource workload, the ratio of the number of tasks per suitably qualified resource, and a non-executable task; and	In i2 Six the memory further includes instructions to cause the processor to configure a lower control level for an alert type, wherein an alert type comprises one of an unconfirmed task whose due date is approaching, a working area workload, a resource workload, the ratio of the number of tasks per suitably qualified resource, and a non-executable task. For example, the i2 Event Management includes the configuration of a lower control level for an alert type, such as a minimum buffer for a "Min. Inventory Violation" alert type, wherein the alert type comprises an unconfirmed task whose due date is approaching, such as the lack of a "supplier response" for supply of a forecasted amount of inventory approaching a "first impact date." *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
provide an alert on the user interface when a value of an object for which an alert has been configured falls below the lower control level.	In i2 Six the memory further includes instructions to cause the processor to provide an alert on the user interface when a value of an object for which an alert has been configured falls below the lower control level. For example, the i2 Event Management provides an alert in the UI, such as a red icon, when the mismatch value for the inventory forecast and the supplier response falls below the minimum buffer value. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
Claim 30	**i2 Six**
An article comprising a computer-readable medium that stores executable instructions for causing a computer system to:	i2 Six includes an article comprising a computer-readable medium that stores executable instructions. For example, Event Management in the i2 Collaborative Supply Execution module can be stored on an article comprising a computer-readable medium that stores instructions to be executed by a computer system.

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	See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
store information describing operations of a warehouse in a database;	In i2 Six the instructions cause the computer system to store information describing operations of a warehouse in a database. For example, i2 software is XML based and operates with different IT platforms (i.e., databases). Warehouse operations are described in data stored in a database, including data about inventory, supplier responses, etc. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
display information on a user interface about an alert type and a category of alert types associated with that alert type, wherein a category of alert types is one of several classes of alert types;	In i2 Six the instructions cause the computer system to display information on a user interface about an alert type and a category of alert types associated with that alert type, wherein a category of alert types is one of several classes of alert types. For example, i2 Six UI for Event Management (in Collaborative Supply Execution module) displays information about alert types (event types) and categories of alert types including forecast, planning, and execution categories. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
receive a user request for information about an alert type stored in the database;	In i2 Six the instructions cause the computer system to receive a user request for information about an alert type stored in the database. For example, in Event Management the information about alerts is stored in a database, therefore there must be a mechanism to retrieve the information (e.g., SQL statements). *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
retrieve the requested information from the database, in response to the request; and	In i2 Six the instructions cause the computer system to retrieve the requested information from the database, in response to the request. For example, in Event Management the information about alerts is stored in a database, therefore there must be a mechanism to retrieve the information (e.g., SQL statements). *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm

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Claim	i2 Six
update the user interface to display the requested information.	In i2 Six the instructions cause the computer system to update the user interface to display the requested information. For example, Event Management UI is updated to display the requested information. See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
Claim 33	**i2 Six**
The article of claim 30 further comprising instructions to cause the computer system to:	
configure an upper control level for an alert type, wherein an alert type comprises one of an unconfirmed task whose due date is approaching, a working area workload, a resource workload, the ratio of the number of tasks per suitably qualified resource, and a non-executable task;	In i2 Six the instructions cause the computer system to configure an upper control level for an alert type, wherein an alert type comprises one of an unconfirmed task whose due date is approaching, a working area workload, a resource workload, the ratio of the number of tasks per suitably qualified resource, and a non-executable task. For example, the i2 Event Management includes the configuration of a lower control level for an alert type, such as a minimum buffer for a "Max. Inventory Violation" alert type, wherein the alert type comprises an unconfirmed task whose due date is approaching, such as the lack of a "supplier response" for supply of a forecasted amount of inventory approaching a "first impact date." See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
and provide an alert on the user interface when a value of an object for which an alert has been configured has been exceeded.	In i2 Six the instructions cause the computer system to provide an alert on the user interface when a value of an object for which an alert has been configured has been exceeded. For example, the i2 Event Management provides an alert in the UI, such as a red icon, when the mismatch value for the inventory forecast and the supplier response exceeds the maximum buffer value. See, e.g., http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
Claim 36	**i2 Six**

The article of claim 30 further comprising instructions to cause the computer system to:	
configure a lower control level for an alert type, wherein an alert type comprises one of an unconfirmed task whose due date is approaching, a working area workload, a resource workload, the ratio of the number of tasks per suitably qualified resource, and a non-executable task;	In i2 Six the instructions cause the computer system to configure a lower control level for an alert type, wherein an alert type comprises one of an unconfirmed task whose due date is approaching, a working area workload, a resource workload, the ratio of the number of tasks per suitably qualified resource, and a non-executable task. For example, the i2 Event Management includes the configuration of a lower control level for an alert type, such as a minimum buffer for a "Min. Inventory Violation" alert type, wherein the alert type comprises an unconfirmed task whose due date is approaching, such as the lack of a "supplier response" for supply of a forecasted amount of inventory approaching a "first impact date." *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm
and provide an alert on the user interface when a value of an object for which an alert has been configured falls below the lower control level.	In i2 Six the instructions cause the computer system to provide an alert on the user interface when a value of an object for which an alert has been configured falls below the lower control level. For example, the i2 Event Management provides an alert in the UI, such as a red icon, when the mismatch value for the inventory forecast and the supplier response falls below the minimum buffer value. *See, e.g.,* http://www.i2.com/MSites/FlashDemo/CSE_Flashkit/BrowserPlayer.cfm

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PROOF OF SERVICE

2   I, Saina S. Shamilov, declare as follows:

3   I am a citizen of the United States and employed in Santa Clara County, State of
California. I am over the age of eighteen years and not a party to the within-entitled action. My
4 business address is Fenwick & West LLP, Silicon Valley Center, 801 California Street, Mountain
View, California 94041.

5
       On **January 11, 2008**, I served a copy of the following document(s): **PLAINTIFF SAP**
6 **AG'S PRELIMINARY INFRINGEMENT CONTENTIONS [PATENT L.R. 3-1]** on the
interested parties in the subject action by placing a true copy thereof as indicated below,
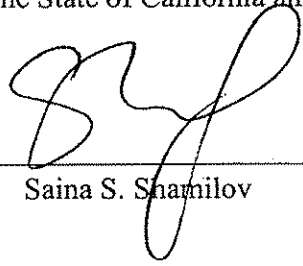7 addressed as follows:

8 Jason Kiyoshi Sonoda, Esq.   Scott W. Hejny, Esq.
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12
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22
      I declare under penalty of perjury under the laws of the State of California and the United
23 States that the above is true and correct.

24

25 Date: January 11, 2008   _____

26   Saina S. Shamilov

27 24320/00402/LIT/1278673.1

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PROOF OF SERVICE   CASE NO. C 07-04187 SBA